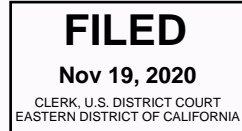


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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 MICHAEL DICKENS,  
15 Defendant.

CASE NO. 1:20-cr-00219-NONE-SKO

18 U.S.C. § 2422(b) – Attempted Coercion and  
Enticement of a Minor; 18 U.S.C. § 1470 -- Transfer  
of Obscene Material to a Minor; 18 U.S.C. §§ 1467(a)  
and 2428(b) – Criminal Forfeiture

16  
17 I N D I C T M E N T

18 COUNT ONE: [18 U.S.C. § 2422(b) – Attempted Coercion and Enticement of a Minor]

19 The Grand Jury charges: T H A T

20 MICHAEL DICKENS,  
21 defendant herein, beginning on or about October 21, 2020, and continuing through on or about October  
22 30, 2020, in the County of Fresno, State and Eastern District of California, and elsewhere, using  
23 facilities and means of interstate and foreign commerce, did knowingly attempt to persuade, induce,  
24 entice, and coerce an individual who he believed had not attained the age of 18 years to engage in sexual  
25 activity for which any person could be charged with a criminal offense, all in violation of Title 18,  
26 United States Code, Section 2422(b).  
27  
28

1 COUNT TWO: [18 U.S.C. § 1470 – Attempted Transfer of Obscene Material to a Minor]

2 The Grand Jury further charges: T H A T

3 MICHAEL DICKENS,

4 defendant herein, beginning on or about October 21, 2020, and continuing through on or about October  
5 30, 2020, in the County of Fresno, State and Eastern District of California, and elsewhere, using any  
6 facility and means of interstate and foreign commerce, did knowingly transfer obscene matter to another  
7 individual who he believed had not attained the age of 16 years, and attempted to do so, all in violation  
8 of Title 18, United States Code, Section 1470.

9 FORFEITURE ALLEGATION: [18 U.S.C. §§ 1467(a) and 2428(b) – Criminal Forfeiture]

10  
11 1. Upon conviction of the offense alleged in Count One of this Indictment, defendant  
12 MICHAEL DICKENS shall forfeit to the United States pursuant to 18 U.S.C. § 2428(b), any property,  
13 real or personal, that was used or intended to be used to commit or to facilitate the commission of such  
14 violations, and any property, real or personal, constituting or derived from proceeds traceable to said  
15 violations.

16 2. Upon conviction of the offense alleged in Count Two of this Indictment, defendant  
17 MICHAEL DICKENS shall forfeit to the United States pursuant to 18 U.S.C. § 1467(a), any obscene  
18 material produced, transported, mailed, shipped, or received in violation of this count, any property, real  
19 or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and,  
20 any property, real or personal, used or intended to be used to commit or to promote the commission of  
21 such offense.

22 3. If any property subject to forfeiture as a result of the offenses alleged in Counts One  
23 and Two of this Indictment, for which defendant is convicted:

- 24 a. cannot be located upon the exercise of due diligence;  
25 b. has been transferred or sold to, or deposited with, a third party;  
26 c. has been placed beyond the jurisdiction of the Court;  
27 d. has been substantially diminished in value; or  
28 e. has been commingled with other property which cannot be divided without

1 difficulty;

2 it is the intent of the United States, pursuant to 18 U.S.C. §§ 1467(b), 2253(b), and 28 U.S.C.  
3 § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of said  
4 defendant, up to the value of the property subject to forfeiture.

5  
6 A TRUE BILL.

7  
8 /s/ Signature on file w/AUSA

9 FOREPERSON  
10  
11  
12

13 MCGREGOR W. SCOTT

14 United States Attorney

**KIRK E. SHERRIFF**

15 KIRK E. SHERRIFF

16 Assistant United States Attorney  
17 Chief, Fresno Office  
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